

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

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2022 NOV 15 P 3:10

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 22-CR-

22-CR-227

v.

[18 U.S.C. §§ 113(a)(6), 1112 and 1153(a)]

ERIN D. SCHWEITZER,
a/k/a ERIN D. MARTIN,

Green Bay Division

Defendant.

INDICTMENT

COUNT ONE
(Involuntary manslaughter)

THE GRAND JURY CHARGES THAT:

1. On or about April 18, 2019, in the State and Eastern District of Wisconsin, and within the exterior boundaries of the Menominee Indian Reservation,

ERIN D. SCHWEITZER, a/k/a ERIN D. MARTIN,

a Native American Indian, unlawfully caused the death of K.R.L., a human being, by committing unlawful acts with a wanton and reckless disregard for human life, knowing that such conduct was a threat to human life, and knowing of circumstances that would reasonably cause the defendant to foresee that such conduct might be a threat to human life.

2. In particular, the defendant caused the Dodge Durango sport utility vehicle ("SUV") that she was driving to crash into an oncoming Kia Sorrento SUV in which K.R.L. was a front-seat passenger, resulting in K.R.L.'s death.

3. The crash occurred as the result of the defendant unlawfully driving and operating the Dodge Durango SUV in the following manner:

- a. at an unreasonable and imprudent speed;
- b. across the solid-yellow center line, in a no-passing zone, into the oncoming traffic lane;
- c. engaged and occupied with an activity, other than driving the vehicle, that interfered with and reasonably appeared to interfere with her ability to drive the vehicle safely;
- d. under the influence of an intoxicant, a controlled substance, and a combination thereof;
- e. with a prohibited alcohol concentration in her blood; and
- f. with a detectable amount of a restricted controlled substance in her blood.

All in violation of Title 18, United States Code, Sections 113(a)(6), 1112, and 1153(a); the Menominee Tribal Motor Vehicle Code, Section 550-1; and the Wisconsin Motor Vehicle Code, Sections 346.05(1), 346.57(2), 346.63(1)(a), 346.63(1)(am), 346.63(1)(b), and 346.89(1).

COUNT TWO
(Assault resulting in serious bodily injury)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 18, 2019, in the State and Eastern District of Wisconsin, and within the boundaries of the Menominee Indian Reservation,

ERIN D. SCHWEITZER, a/k/a ERIN D. MARTIN,

a Native American Indian, assaulted W.M.B., a human being, resulting in serious bodily injury to W.M.B.

2. In particular, under the circumstances as alleged in Count One of this indictment, the defendant caused the Dodge Durango SUV that she was driving to crash into an oncoming Kia Sorrento SUV that W.M.B. was driving, resulting in a closed-head injury, broken arms and ribs, and extreme physical pain to W.M.B.

All in violation of Title 18, United States Code, Sections 113(a)(6) and 1153(a); the Menominee Tribal Motor Vehicle Code, Section 550-1; and the Wisconsin Motor Vehicle Code, Sections 346.05(1), 346.57(2), 346.63(1)(a), 346.63(1)(am), 346.63(1)(b), and 346.89(1).

COUNT THREE
(Assault resulting in serious bodily injury)

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 18, 2019, in the State and Eastern District of Wisconsin, and within the boundaries of the Menominee Indian Reservation,

ERIN D. SCHWEITZER, a/k/a ERIN D. MARTIN,

a Native American Indian, assaulted S.A.B., a human being, resulting in serious bodily injury to S.A.B.

2. In particular, under the circumstances as alleged in Count One of this indictment, the defendant caused the Dodge Durango SUV that she was driving to crash into an oncoming Kia Sorrento SUV in which S.A.B. was a back-seat passenger, resulting in a broken leg and extreme physical pain to S.A.B.

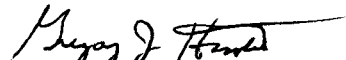
All in violation of Title 18, United States Code, Sections 113(a)(6) and 1153(a); the Menominee Tribal Motor Vehicle Code, Section 550-1; and the Wisconsin Motor Vehicle Code, Sections 346.05(1), 346.57(2), 346.63(1)(a), 346.63(1)(am), 346.63(1)(b), and 346.89(1).

A TRUE BILL:



FOREPERSON

Dated: 11/15/22



GREGORY J. HAANSTAD
United States Attorney